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June 5, 2020

Honorable Karen M. Williams, U.S.M.J.
U.S. District Court, District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets Room 1050
Camden, NJ 08101

Re: The HomeSource Corp. v. Retailer Web Services, LLC
Case No. 1:18-cv-11970

Dear Magistrate Judge Williams:

This firm is newly engaged local counsel for Defendant, Retailer Web Services, LLC ("RWS"), in the above referenced matter. I write to update the Court and request a telephone conference next week at the Court's convenience.

Pursuant to the Court's May 20, 2020 Order [Doc. No. 175], the Court, *sua sponte*, found good cause to seal the Kane Declaration located at Docket Number 140-1 as well as the Certification of James H. Kane, Jr. located at Docket Number 134. The Court found:

These documents were filed on the Docket at the Court's direction to support RWS's omnibus Motion to Seal and to provide the Court necessary information to contextualize the nature of the materials at issue and the alleged harm RWS will incur if sealing is denied. The information contained therein might not have been revealed otherwise, thus the Court shall seal the Kane Declaration and the Kane Certification as they were provided for the limited purpose of aiding the Court.

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[Doc. No. 175 at page 27.] Today, RWS will file the redacted versions of the Kane Declaration and Certification pursuant to Local Civil Rule 5.3(c)(7). RWS will also file redacted versions of previously filed documents that contained personal identifiers consistent with your Order.¹

Regarding the paragraph cited above from the Court's Order granting *sua sponte* relief, RWS is uncertain whether it should also file redacted versions of Docket Numbers 144 and 146, to the extent these docket entries contain four short and direct citations to the Kane Certification, regarding the exact ownership percentages of various entities.² These citations are not found outside of the Kane documents. RWS respectfully requests a telephone conference with Your Honor and Plaintiffs to discuss the scope of the Court's Order to ensure RWS is conforming with the Court's intention. RWS will, of course, file any application the Court deems appropriate following the Court's guidance on this issue.

Respectfully submitted,

s/Louis R. Moffa, Jr.

Louis R. Moffa, Jr.

LRM:gme

cc: Adam Wolek, Esquire (*via ECF notification*)
William C. Wagner, Esquire (*via ECF notification*)

¹ RWS withdraw its request to seal Doc. No. 115 with respect to the identity of RWS's internet service provider.

² Plaintiffs disagree with RWS's interpretation.